

said power supply unit serial number,

according to said device request.

[a] "two power supply unit controllers"

Examiner concludes, without support, at pages 3 and 4 that "it would have been obvious to one of ordinary skill in the art to employ the power supply unit controllers as taught by Sterzik and Hong in a system comprising at least two power supply unit controllers . . ." But both Hong and Sterzik teach away from this reading, always referring to a power supply unit type controller in the singular. Applicant's attorney disagrees with the Examiner's above views, and motivated by the case of *In re Ahlert and Kruger*, 165 USPQ 418 (CCPA 1970) Applicant's attorney hereby challenges these views and asks whether the Examiner can show support for the same.

[b] "memory for storing . . ."

Applicant has searched the references and can find no mention of this limitation. The Examiner is requested withdraw the rejection or to point out, by column and line number, where in either reference there may be seen the existence of "memory for storing" at least one value associated with a respective one of the at least one signal; "memory for storing" at least one *scaling value* associated with a respective one of the at least one signal and dependent on said power supply unit; and "memory for storing" a power supply unit *serial number*.

[c] "at least one scaling value"

Examiner suggests that the Sterzik provides "at least one scaling value" at col. 1, lines 30-55, and col. 2, lines 11-14 but the undersigned is unable to find a scaling value there. So far as the undersigned can discern in these some 25 lines of text, Sterzik makes no mention of "scaling value". As far as the undersigned can tell nowhere in Sterzik, nor anywhere in Hong for that matter, do the words "scaling" or "scaling value" appear. The Examiner is requested to point to where in either reference by column and line number where such limitation may be found or in the alternative withdraw the rejection.

[d] "power supply unit serial number"

The Examiner appears to suggest that the limitation, "power supply unit serial number" may be found in Sterzik at col. 3 lines 24-27. See paragraph no. 4 of the office action. It appears that the Examiner is attempting to equate the words "serial numbers" as used in the present claim with the words "part numbers" as used in Sterzik. These words are not interchangeable or synonymous. In general one might well expect two power supply controllers to have identical part numbers, yet one would not expect them to have identical serial numbers. (Serial numbers are generally unique while part numbers often are not.) The effort to treat the terms as interchangeable or synonymous is apparently motivated by the fact that the claims are limited with respect to serial numbers, while Sterzik mentions "part numbers"; the undersigned is unable to locate in Sterzik or Hong the words "serial" or "serial numbers". The Examiner is requested to point to where in either reference, by column and line number, such limitation may be found or in the alternative withdraw the rejection.

[e] "communicating means, responsive to a request from one of said devices . . ."

At pages 3 and 4 of the office action Examiner states without support, that various things would supposedly be obvious to one skilled in the art, among them that it would supposedly be obvious to combine the two references (despite one reference being in the remote-control art and the other being in a different art) and that, "Hong teaches communicating means, responsive to a request from one of the device, for returning a state of said power supply unit to said requesting device." However, nowhere in Hong can the undersigned find that the state of power supply unit includes [c] and [d] as described above. Further, nowhere in Sterzik can the undersigned find the same limitations. Applicant's attorney disagrees with the above views, and motivated by the case of *In re Ahlert and Kruger*, 165 USPQ 418 (CCPA 1970) Applicant's attorney hereby challenges these views and asks whether the Examiner can show support for the same.

CLAIM 8:

8. The system of claim 7 in which each of controllers requires power to operate, each controller drawing said power from the backplane and thus not dependent upon its said associated power supply unit for said power.

Examiner rejects this claim, apparently without logical connection, saying that, "Hong discloses a power controller [10] powered by a power supply [11], and Applicant's Admitted Prior Art teaches that devices powered by a power supply in a rack enclosure are powered via the backplane." However, in Hong, the monitoring circuitry upon which the Examiner apparently attempts to read the claims is circuitry which (so far as the undersigned can discern) is powered by the very battery that is being monitored. The present claim makes clear the distinction that the controller of the claim is able to draw power from the backplane and thus from a source other than the associated power supply unit.

CLAIM 9:

9. The system of claim 7 wherein each said controller is arranged to store scaling values dependent on the supply levels supplied by the power supply unit associated with the controller.

Claim 9 differs from claim 7, *inter alia*, in that there are "scaling values" in the plural. The Examiner had not pointed out anywhere in either reference where a single scaling value could be found. Yet claim 9 calls for a plurality of scaling values, thus all the more distinguishing over the cited references. Reconsideration is requested.

CLAIM 10:

10. The system of claim 7 wherein said device is a higher level processor arranged to monitor environmental conditions in an entire rack enclosure and each controller is responsive to a request from said processor to return said scaling values.

The Examiner states that this limitation may be found in Hong at col. 1, lines 44-55. The undersigned is, however, unable to find this limitation at the location suggested by the Examiner. The terms "higher level" and "rack enclosure" cannot, for example, be found in the reference.

Reconsideration is requested.

CLAIM 11:

11. The system of claim 7 wherein each said controller is arranged to store a respective power supply unit serial number, the respective power supply unit serial number different from that of the serial number of any other power supply of the system.

The Examiner states that, "Sterzik discloses that the part number and any other information can be retrieved from a power supply unit and communicated to a remote system in order to facilitate identification of a power supply, . . ." As described above, a serial number and a part number are not synonymous nor are they interchangeable as one may expect part numbers to be the same but serial numbers to differ. Applicant can find no instances of the words "serial" or "serial number" in either Hong or Sterzik. Further the undersigned has search col. 2, lines 60 - 67 and col. 3, lines 25-27 and is unable to find this, "any other information" teaching described above.

Reconsideration is requested.

CLAIM 12:

12. The system of claim 7 wherein each said controller is responsive to a device request to condition the amount of information returned by the power supply unit controller in response to the request.

The Examiner states that Hong discloses that the controller is responsive to a device request to condition the amount of information returned by the power supply unit controller. The undersigned has diligently studied the cited places within Hong and is unable to find this limitation. Reconsideration is requested.

CLAIM 13:

13. A system comprising at least two power supply unit controllers for a rack enclosure in which a plurality of devices communicate via a backplane, each said controller comprising:

means for reading at least one signal indicative of an output supply level being provided to said backplane by a power supply unit associated with said power supply unit

controller;

memory for storing at least one value associated with a respective one of the at least one signal, at least one scaling value associated with a respective one of the at least one signal and dependent on said power supply unit, and a power supply unit serial number; and

communicating means, responsive to a request from one of said devices, for a returning a state of said associated power supply unit to said requesting device, said state including a combination of:

a summary of the current status of the power supply unit,

said at least stored one value,

said at least stored scaling value, and

said stored power supply unit serial number,

according to said device request;

each controller requiring power to operate, each controller drawing said power from the backplane and thus not dependent upon said associated power supply unit for said power.

For claim 13, Applicant renews the above arguments with regard to claims 7-12. Further, the undersigned notes that claim 13 differs from claim 7 in that claim 13 further includes the underlined limitation.

Examiner rejects this claim with arguments, apparently without logical connection. In addition to the Examiner's arguments supporting the rejection of claim 7, Examiner rejects the underlined limitation saying that, "Hong discloses a power controller [10] powered by a power supply [11], and Applicant's Admitted Prior Art teaches that devices powered by a power supply in a rack enclosure are powered via the backplane." However, in Hong, the monitoring circuitry upon which the Examiner apparently attempts to read the claims is circuitry which (so far as the undersigned can discern) is powered by the very battery that is being monitored. The underlined limitation above makes clear the distinction that the controller of claim 13 is able to draw power from the backplane and thus from a source other than the associated power supply unit.

In view of the foregoing remarks, the undersigned submits that claims 7-13 as now pending are not obvious over the cited combination of references. For these reasons, this application is now considered to be in condition for allowance and such action is earnestly solicited. Applicant believes no fee to be due with the filing of this paper, however, if a fee is deemed due the undersigned authorizes the commissioner to charge 15-0160.

Respectfully submitted,



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